

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

ROCKDALE COUNTY,

*Plaintiff,*

*v.*

BIO-LAB INC., *et al.*,

*Defendants.*

C. A. No. 1:24-cv-04916-SEG

JURY TRIAL DEMANDED

NOTICE OF PROPOSED  
AGENDA FOR STATUS CONFERENCE

Plaintiff Rockdale County and Defendants Bio-Lab, Inc., KIK International, LLC, and KIK Custom Products, Inc., (together, “Parties”), pursuant to this Court’s February 4, 2025, Minute Order in the case No. 1:24-cv-04407-SEG, submit the following *Notice of Proposed Agenda* for the February 18, 2025, Status Conference.

**Agenda Item 1: Case Management Schedule**

The Parties have met and conferred regarding a case management schedule and have reached an agreement. The Parties filed a *Notice of Proposed Scheduling Order* on February 12, 2025 [Doc. 43], setting forth deadlines coordinated with the Proposed Scheduling Order submitted by the plaintiffs and defendants Bio-Lab, Inc., KIK International, LLC, KIK Custom Products, Inc., and KIK US Holdings, LLC, in the case *In Re Bio-Lab Class Action*, Case No. 1:24-cv-04407-SEG [Doc. 146], when applicable. The Parties’ *Proposed Scheduling Order* aligns with the Court’s instruction that, while the County’s suit will not be consolidated with the eighteen

putative class actions, the Court does see the need for coordination between the parties, particularly regarding discovery [Doc. 59, Case No. 1:24-cv-4407-SEG].

Dated: February 14, 2025

Respectfully submitted,

/s/ Michael A. Caplan

Michael A. Caplan

Ga. Bar No. 601039

Jessica Arnold Caleb

Ga. Bar No. 141507

Emily C. Snow

Ga. Bar No. 837411

Michael L. Eber

Ga. Bar No. 859338

**CAPLAN COBB LLC**

75 Fourteenth Street NE, Suite 2700

Atlanta, Georgia 30309

Tel: (404) 596-5600

Fax: (404) 596-5604

[mcaplan@caplancobb.com](mailto:mcaplan@caplancobb.com)

[jarnold@caplancobb.com](mailto:jarnold@caplancobb.com)

[esnow@caplancobb.com](mailto:esnow@caplancobb.com)

[meber@caplancobb.com](mailto:meber@caplancobb.com)

/s/ Mirza Qader Ali Baig

Mirza Qader Ali Baig (GA # 031610)

**M. QADER A. BAIG & ASSOCIATES, LLC**

913 Commercial Street NE

Suite B

Conyers GA 30012-4537

Tel. (770) 929-1665

[mqab@mqabl原因.com](mailto:mqab@mqabl原因.com)

/s/ Shayna E. Sacks

Shayna E. Sacks

*(Admitted Pro Hac Vice)*

**NAPOLI SHKOLNIK PLLC**

360 Lexington Avenue

Floor 11

New York NY 10017-6502

Tel. (212) 397-1000

[ssacks@napolilaw.com](mailto:ssacks@napolilaw.com)

Alan E. Schoenfeld\*

**WILMER CUTLER PICKERING**

**HALE AND DORR LLP**

7 World Trade Center

250 Greenwich Street

New York, NY 10007

Tel.: (212) 230-8800

Fax: (212) 230-8888

[alan.schoenfeld@wilmerhale.com](mailto:alan.schoenfeld@wilmerhale.com)

Hunter J. Shkolnik

*(Admitted Pro Hac Vice)*

Paul J. Napoli

*(Admitted Pro Hac Vice)*

Veronica N. Vazquez Santiago

*(Admitted Pro Hac Vice)*

**NS PR LAW SERVICES LLC**

1302 Avenida Ponce de León

San Juan PR 00907-3982

Tel. (833) 271-4502

[hunter@nsprlaw.com](mailto:hunter@nsprlaw.com)

[pnapoli@nsprlaw.com](mailto:pnapoli@nsprlaw.com)

[vvazquez@nsprlaw.com](mailto:vvazquez@nsprlaw.com)

Felicia H. Ellsworth\*

**WILMER CUTLER PICKERING**

**HALE AND DORR LLP**

60 State Street

*Counsel for Plaintiff*

Boston, MA 02109  
Tel: (617) 526-6000  
Fax: (617) 526-5000  
felicia.ellsworth@wilmerhale.com

*\*Admitted pro hac vice*

***Counsel for Defendants Bio-Lab, Inc.,  
KIK International LLC, and KIK  
Custom Products Inc.***

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, allowing the font type of Book Antiqua and point size of 13.

/s/ Shayna E. Sacks  
Shayna E. Sacks

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on February 14, 2025 via the Court's CM/ECF system.

/s/ Shayna E. Sacks  
Shayna E. Sacks